

North Coast Integrated Regional Water Management Plan Evaluation of IRWMP & NCIRWMP Process, Phase I October 18th, 2006

The Integrated Regional Water Management Planning process has been immensely positive for the North Coast of California - providing an opportunity and an incentive for a significant and unique hydrologic region to work collaboratively and proactively on critical water management challenges, to reduce conflicts, and to identify and prioritize meaningful projects in some of the most disadvantaged communities in the state. Our experience in the last two years supports the concept that large scale, adaptive planning - administered at the local level with strong communication and linkages to state agencies and priorities - is an effective means to manage water resources. We believe that the emphasis on integrating project implementation with regional scale planning is the most efficient mechanism for protecting and enhancing water and natural resources. We appreciate the State's vision in developing this unique and effective approach, and strongly support the continuation of this new paradigm for integrated water planning.

The North Coast IRWMP places a strong emphasis on science-based planning and adaptive management - constantly evaluating and seeking to improve our programmatic approach as new information becomes available. One aspect of adaptive management is monitoring and evaluation - including projects and the planning process itself. Programmatic evaluation has been taking place on an ongoing basis - with project staff documenting input from stakeholders and partners over the last two years. In addition to this ongoing evaluation process, more formal evaluations are scheduled at key points in time.

In August of 2006, the NCIRWMP leadership requested a formal evaluation of the IRWM process to date. Beginning in September, the project team conducted interviews with the Policy Review Panel, the Technical Peer Review Committee and the twenty five Priority Project Proponents. These participants engaged in phone interviews with the project team ranging from 30-60 minutes each. Interview questions requested input on the State's process as well as processes specific to the North Coast, and focused on the following three areas: a) documentation of the resource allocation required to participate in the Integrated Planning program, b) positive aspects of the program that should be retained or enhanced and c) suggested revisions to the Round 1 IRWM program. This information, as well as the ongoing input provided to the project team, is included in the summary below.

RESOURCE ALLOCATION - NCIRWMP

The following table documents a conservative estimate of resources allocated to the IRWM planning and application process by the North Coast.

Entity/Entities	Allocation Type	Value	Notes
Sonoma County Water Agency	Staffing & funding	\$690,000	Provide access to the IRWM program, develop website and NCIRWM Plan, technical assistance and staffing for the North Coast effort
Policy Review Panel	Volunteer Policy Review	\$73,500	Fourteen members, 70 hours each @ \$75/hour
Technical Peer Review Committee	Voluntary Technical Review	\$84,000	Fourteen members, 120 hours each @ \$50/hour
Project Proponents	Application Process	\$300,000	Based on actual staff/consultant rates, as well as unpaid project proponent time. Materials and supplies costs, as well as mapping, printing, copying, and FedEx are also included.
TOTAL		\$1,147,500	

POSITIVE FEATURES OF THE IRWM

The NCIRWM leadership and stakeholders believe that the IRWM program has been extremely positive for the North Coast - providing an incentive for collaborative planning, increasing the emphasis on effective cross-disciplinary water management, reducing conflict via open transparent communication, and building capacity in terms of regional understanding and synthesis of complex state, regional and local issues. Following are positive features of the IRWM program that interviewees felt should be retained or enhanced in Round 2.

New Paradigm for Planning

The North Coast supports the continued emphasis on integrated planning and project implementation at the hydrologic region scale. The IRWM program's focus and legislative intent fits well with the needs of the North Coast. Given our emphasis on economic vitality in the context of natural resource protection and enhancement, we need a framework that allows for landscape scale planning, supports the use of watershed and jurisdictional boundaries as planning units, and emphasizes stakeholder education and involvement. The IRWM program's integrated approach provided a new frame of reference and language for the region, has acted as a catalyst to identify and synthesize key issues and project needs, and has ensured - for the first time - that the water infrastructure constituency and the natural resources constituency collaborate with one another in a meaningful way. The regional planning approach serves as an insulator from regional conflicts and as a nexus for

municipalities, counties, NGOs and the public to address regional issues and needs, while complementing and integrating planning efforts at the State level.

Capacity Building

The North Coast region initially entered into the IRWM process in order to secure funding for key projects in the region. Over time, it has become apparent that the IRWM program is more than just a grant opportunity - it is a major catalyst for capacity building. The IRWM program requirements - however challenging - have resulted in a significant expansion of technical and policy understanding for individual agencies and groups, as well as the region as a whole. The following developments demonstrate this increased capacity in the North Coast:

a) The North Coast's capacity has been enhanced by the formation of a seven county leadership and technical review team that engage in open and transparent dialogue, and welcome and include the public in their conversations and decisions. The capacity for collaboration and effective coordination has been increased due to this dialogue and focus on effective integrated management. Leaders, technical staff and stakeholders have an increased understanding of statewide priorities and program preferences, regional issues of concern, as well as local issues and potential solutions that benefit North Coast communities. Sharing of information across counties and watersheds has resulted in enhanced capacity for all participating stakeholders.

b) The region's projects have been substantially improved as a result of being vetted through the IRWM process. During Step 1, opportunities for enhanced integration were identified by the project team, technical team and the proponents themselves. The NCIRWM website was an effective tool for this synthesis, when combined with the guidelines and PSPs issued by the State. Step 2 was very challenging for the region, but the emphasis on economic and technical evaluation of the projects, the requirement for project integration, the context and details of the projects, resulted in greatly enhanced project quality and synthesis.

Communication

The North Coast appreciates the effective, open and supportive communication between State staff and our leadership and project team. State staff members have been responsive, clear, helpful and professional, clearly in the midst of great pressure and challenging program implementation deadlines.

Honoring Local Autonomy & Decision Making Process

The North Coast is very appreciative that the IRWM program honored our regional project prioritization. This approach to planning acknowledges and incorporates local autonomy and local expertise, areas which are important to the leadership and stakeholders in our region, within a framework that integrates statewide planning priorities.

Application

The guidelines and the PSP were clear. The online application was efficient, functional and well organized. We appreciate the word limits.

SUGGESTED REVISIONS TO ROUND ONE IRWM PROGRAM

The North Coast appreciates the State's demonstrated willingness to solicit input from IRWM program participants, and to act on constructive suggestions. Our suggestions are focused on timing issues, mid-round changes, and the challenges that disadvantaged communities face in participating in this rigorous program. We also provide a few suggestions on the application itself.

Capacity Building: Support for Disadvantaged Communities

The IRWM program represents a new and positive paradigm in regional integrated planning one that the North Coast supports and has sincerely embraced. However, without assistance, the predominantly disadvantaged communities in our region do not have the technical or funding capacity to respond to this rigorous and complicated application process. Without funding provided by the Sonoma County Water Agency, the North Coast would not have been competitive, and might not have been able to participate in the IRWM program. In terms of equity, the current IRWM program is structured such that large, well funded, predominantly urban entities have a clear competitive advantage over small, rural, disadvantaged communities - despite the importance of their water management issues and their regional influence on water quality and natural resources.

Suggestions for balancing this inequity include up-front allocations of funds for technical assistance and capacity building to disadvantaged communities, or the award of a block grant to disadvantaged regions that acknowledges the need for a first phase of technical assistance and capacity development, followed by project design and implementation. While the current planning grants are critically important, and should be continued, the concept of capacity-building grants goes beyond the current level of planning grant assistance, and would only be for disadvantaged communities. This approach to capacity building should require disadvantaged regions to develop a long term financing plan, so that the disadvantaged region would only rely upon State funding for a relatively short period of time. Our experience indicates that we have numerous high quality, critically important projects in the North Coast. However, many of our stakeholders lack the experience, resources and the technical writing/grant development skills to articulate these projects such that they align with the state application process. We feel confident that the State's intent is not to reward good grant-writers, but rather to support meaningful planning and positive on-the-ground change.

Mid-Round Changes to Program

The reduction of the budget amount mid-round detracted from team building and integration opportunities. The mid-round reduction also affected our resource allocation, causing us to spend large amounts of our limited resources in new review time and new process development for the budget reduction. The mid-round budget reduction created a climate of competitiveness during Step 2 when project proponents should have been finding ways to more fully integrate and work together. The reduced budget skewed the project ranking process, and created challenges to the regional decision-making process by the Technical Peer Review Committee and Policy Review Panel. Had this information been articulated in advance, North Coast participants could have utilized their limited time and resources in a more efficient and cost effective manner.

Step 2 Application

- Please consider making the economic attachments (10 and 11) simpler at the project level, and requiring more robust quantitative/qualitative data at the regional scale.
- Please consider combining the step 1 and step 2 PSP, so that the ultimate application requirements are seamless and clear in advance
- Please create a format that allows applicants to list scientific and technical merit citations in one place, and then refer back to this citation list/bibliography in other parts of the application. Consider only requiring the actual documents if they are not widely distributed or easily accessed (ie, project-specific feasibility studies, but not the CDFG Coho Recovery Strategy).
- Please consider requiring only a digital application - we believe the FFAST application process is excellent, and that requiring both electronic and hard copy documents is redundant and uses a substantial amount of natural and human resources.

Timing/Timeline

The coincident timing of the IRWM grant process with other major grant processes (Consolidated, CDFG) created confusion, and potentially an inefficient use of grant funds and regional resources. Many of the disadvantaged communities that had priority projects that were ready to go could not commit the resources to the multiple rigorous application processes that were taking place within virtually the same timeframe. This translates into an inherent bias against small disadvantaged communities, agencies and NGOs that do not have staff and consultants to take advantage of these grant programs.

The North Coast is strongly aligned with the ambitious IRWM program goals. Given the fact that we view the IRWM process as more than just a short-term funding opportunity, but as a long term programmatic planning approach, we need time to review, analyze and incorporate this new paradigm and state priorities into our regional planning process. Outreach and education, project identification, technical review, inclusive planning, and project refinement and selection require substantial time, if these activities are to be meaningful as opposed to a superficial means to score well.

The timeline for the Step 2 application submittal was too short, and created significant stress for the volunteer Technical Peer Review Committee, the Policy Review Panel and project proponents - many of whom represent disadvantaged communities. While the process itself is positive, we had to condense months of work into a very short window. Though we were able to complete a quality application, the process would have been more beneficial to the region - as a teambuilding and capacity building process, a project vetting process, and as a means to perform education and outreach to underserved communities - if the timeline had been more reasonable. We also believe that a more reasonable timeline would support the State's program goals.

Thank you for the opportunity to comment and provide input. If you would like to follow up with the North Coast IRWMP effort, please contact Karen Gaffney, West Coast Watershed at 707.433.7377 or kaaffney@westcoastwatershed.com.